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*Additional Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

KEITH ANDREWS, an individual,  
 TIFFANI ANDREWS, an individual.  
 BACIU FAMILY LLC, a California  
 limited liability company, ROBERT  
 BOYDSTON, an individual. CAPTAIN  
 JACK'S SANTA BARBARA TOURS,  
 LLC, a California limited liability  
 company, MORGAN CASTAGNOLA, an  
 individual, THE EAGLE FLEET. LLC., a  
 California limited liability company,  
 ZACHARY FRAZIER, an individual,  
 MIKE GANDALL, an individual,  
 ALEXANDRA B. GEREMIA, as Trustee  
 for the Alexandra Geremia Family Trust  
 dated 8/5/1998, JIM GUELKER, an  
 individual, JACQUES HABRA, an  
 individual, ISURF, LLC, a California

**Case No. 2:15-cv-04113-PSG-JEM**

[Consolidated with Case Nos. 2:15-CV-  
 04573 PSG (JEMx), 2:15-CV-4759 PSG  
 (JEMx), 2:15-CV-4989 PSG (JEMx),  
 2:15-CV-05118 PSG (JEMx), 2:15-CV-  
 07051- PSG (JEMx)]

**PLAINTIFFS' UNOPPOSED  
 APPLICATION TO FILE UNDER  
 SEAL CERTAIN PREVIOUSLY  
 FILED DECLARATIONS AND  
 EXHIBITS UNDER L.R. 79-5.2.2(a)**

Date: December 5, 2016  
 Time: 1:30 p.m.  
 Location: Courtroom 880  
 Judge: Hon. Philip S. Gutierrez

1 limited liability company, MARK  
2 KIRKHART, an individual, MARY  
3 KIRKHART, an individual, RICHARD  
4 LILYGREN, an individual, HWA HONG  
5 MUH, an individual, OCEAN ANGEL IV,  
6 LLC, a California limited liability  
7 company, PACIFIC RIM FISHERIES.  
8 INC, a California corporation, SARAH  
9 RATHBONE, an individual,  
10 COMMUNITY SEAFOOD LLC, a  
11 California limited liability company,  
12 SANTA BARBARA UNI, INC., a  
13 California corporation, SOUTHERN CAL  
14 SEAFOOD, INC., a California  
15 corporation, TRACTIDE MARINE  
16 CORP., a California corporation, WEI  
17 INTERNATIONAL TRADING INC., a  
18 California corporation and STEPHEN  
19 WILSON, an individual, individually and  
20 on behalf of others similarly situated,

21  
22 Plaintiffs,

23 v.

24 PLAINS ALL AMERICAN PIPELINE,  
25 L.P., a Delaware limited partnership,  
26 PLAINS PIPELINE, L.P., a Texas limited  
27 partnership, and JOHN DOES 1 through  
28 10,

Defendants.

PLEASE TAKE NOTICE THAT Plaintiffs Keith Andrews, Baci Family LLC, Robert Boydston, Captain Jack's Santa Barbara Tours, LLC, Morgan Castagnola, the Eagle Fleet, LLC, Zachary Frazier, Mike Gandall, Alexandra B. Geremia, Jim Guelker, Jacques Habra, iSurf, LLC, Mark Kirkhart, Mary Kirkhart, Richard Lilygren, Hwa Hong Muh, Ocean Angel IV, LLC, Pacific Rim Fisheries, Inc., Sarah Rathbone, Community Seafood, LLC, Santa Barbara Uni, Inc., Southern Cal Seafood, Inc., Wei International Trading Inc., and Stephen Wilson, by and through their counsel of record, respectfully apply for permission to re-file under seal certain previously publicly filed declarations and exhibits. Concurrently with this Application, Plaintiffs will file their "Application Regarding Removal of Confidential Information." By these applications, Plaintiffs ask the Court to remove the existing unredacted images from the public record, to permit Plaintiffs to replace them with redacted versions and to refile the unredacted versions under seal.

In particular, Plaintiffs respectfully seek leave of Court to re-file portions of the following under seal:

1. Declaration of Keith Andrews in Support of Plaintiffs' Motion for Class Certification (Previous Dkt # 124-1).
2. Declaration of Morgan Castagnola in Support of Plaintiffs' Motion for Class Certification (Previous Dkt # 124-5).
3. Declaration of Mike Gandall in Support of Plaintiffs' Motion for Class Certification (Previous Dkt # 124-7).
4. Declaration of Hunter S. Lenihan, Ph.D., in Support of Plaintiffs' Motion for Class Certification (Previous Dkt # 127).
5. Declaration of Hunter S. Lenihan, Ph.D., in Support of Plaintiffs' Motion for Class Certification (Previous Dkt #131).
6. Corrected Declaration of Hunter S. Lenihan, Ph.D., in Support of Plaintiffs' Motion for Class Certification (Previous Dkt #146).
7. Plaintiffs' Notice of Errata (Previous Dkt #147).

8. Declaration of Hunter S. Lenihan, Ph.D., Regarding Notice of Errata  
(Previous Dkt # 147-1).

9. Exhibit 1 to Declaration of Hunter S. Lenihan, Ph.D., Regarding Notice of  
Errata (Previous Dkt # 147-2).

10. Exhibit 2 to Declaration of Hunter S. Lenihan, Ph.D., Regarding Notice of  
Errata (Previous Dkt. # 147-3).

This Application is made pursuant to Local Civil Rule 79-5.2.2(a) and supported  
by the attached Declaration of Juli Farris.

Dated: October 7, 2016

Respectfully submitted,

KELLER ROHRBACK L.L.P.

By: /s/Juli E. Farris  
Juli E. Farris

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18 *Additional Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Sarah Skaggs, hereby certify that on October 7, 2016, I electronically filed PLAINTIFFS' UNOPPOSED APPLICATION TO FILE UNDER SEAL CERTAIN PREVIOUSLY FILED DECLARATIONS AND EXHIBITS UNDER L.R. 79-5.2.2(A) with the Clerk of the United States District Court for the Central District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Sarah Skaggs  
Sarah Skaggs